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Attorneys for Defendant
THE GUARDIAN INSURANCE AND
ANNUITY COMPANY, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RICHARD BATCHELOR

Plaintiff,

v.

GUARDIAN INSURANCE AND
ANNUITY COMPANY, INC. and DOES 1-
10,

Defendants.

Case No. 3:15-cv-4013-JCS

**STIPULATION TO EXTEND TIME TO
RESPOND TO INITIAL COMPLAINT
(LR 6-1(a))**

Removal Filed: September 2, 2015
Hon Joseph C. Spero

TO THE COURT:

Pursuant to Local Rule 6-1(a), and by consent of counsel in writing, Plaintiff Richard Batchelor ("Plaintiff") and Defendant The Guardian Insurance and Annuity Company, Inc. ("Guardian") stipulate as follows:

1. On or about July 27, 2015, Plaintiff filed a civil action against Guardian in the Superior Court of the State of California for the County of Contra Costa, Case No. C15-01300. Notice of Removal [Doc. No. 1], Exhibit 1.

2. Guardian was served on or about August 3, 2015. Declaration of Jodi K. Swick [Doc. No. 1-2], ¶ 2.

3. Guardian removed this case to the United States District Court for the Northern District of California on September 2, 2015. Notice of Removal [Doc. No. 1].

4. Guardian's deadline to answer, move or otherwise respond to Plaintiff's Complaint is September 9, 2015.

5. Plaintiff has agreed that Guardian may have an extension of twenty-two (22) days, or until **October 1, 2015**, to answer, move, or otherwise respond to Plaintiff's Complaint.

Dated: September 9, 2015.

STIPULATED TO BY:

EDISON, McDOWELL & HETHERINGTON
LLP

By: /s/ Jodi K. Swick

Jodi K. Swick

Thomas F.A. Hetherington*

Blaire B. Johnson*

*pro hac vice applications to be submitted

Dated: 9/10/15



Attorneys for Defendant
THE GUARDIAN INSURANCE AND
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MILES & WESTBROOK

By: /s/ Joel M. Westbrook (w/ permission)

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RICHARD BATCHELOR